## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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JEFFREY LAYDON, on behalf of himself and all : others similarly situated, :

Plaintiff,

Case No: 12-cv-3419 (GBD)

v.

MIZUHO BANK, LTD., THE BANK OF TOKYO-MITSUBISHI UFJ, LTD, THE SUMITOMO TRUST AND BANKING CO., LTD., THE NORINCHUKIN BANK, MITSUBISHI UFJ TRUST AND BANKING CORPORATION, SUMITOMO MITSUI BANKING CORPORATION, RESONA BANK, LTD., J.P. MORGAN CHASE & CO., J.P. MORGAN CHASE BANK, NATIONAL ASSOCIATION, J.P. MORGAN SECURITIES PLC, MIZUHO CORPORATE BANK, LTD., DEUTSCHE BANK AG, MIZUHO TRUST AND BANKING CO., LTD., THE SHOKO CHUKIN BANK, LTD., SHINKIN CENTRAL BANK, UBS AG, UBS SECURITIES JAPAN CO. LTD., THE BANK OF YOKOHAMA, LTD., SOCIÉTÉ GÉNÉRALE SA, THE ROYAL BANK OF SCOTLAND GROUP, PLC, ROYAL BANK OF SCOTLAND PLC, RBS SECURITIES JAPAN LIMITED, BARCLAYS BANK PLC, CITIBANK, NA, CITIGROUP, INC., CITIBANK, JAPAN LTD., CITIGROUP GLOBAL MARKETS JAPAN, INC., COÖPERATIEVE CENTRALE RAIFFEISEN-BOERENLEENBANK B.A., HSBC HOLDINGS PLC, HSBC BANK PLC, ICAP PLC, R.P. MARTIN HOLDINGS LIMITED AND JOHN DOES NOS. 1-50,

Defendants.

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DISCLOSURE STATEMENT OF DEFENDANTS

JPMORGAN CHASE & CO. AND J.P. MORGAN SECURITIES PLC

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendants

JPMorgan Chase & Co. and J.P. Morgan Securities plc, by their undersigned counsel, state as

follows:

1. Defendant JPMorgan Chase & Co. is a publicly held corporation. JPMorgan

Chase & Co. does not have a parent corporation and no publicly held corporation owns 10

percent or more of JPMorgan Chase & Co's stock.

2. Defendant J.P. Morgan Securities plc is an indirect wholly-owned subsidiary

of JPMorgan Chase & Co., a publicly held corporation. No other publicly held corporation owns

10 percent or more of J.P. Morgan Securities plc's stock.

Dated: New York, New York

June 11, 2013

Respectfully submitted,

SIMPSON THACHER & BARTLETT LLP

By:

/s/ Thomas C. Rice

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